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Proposed Lead Counsel

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

SOUTHERN DIVISION

FRED JEAN, Individually and on Behalf of All Others Similarly Situated,
 	
                              Plaintiff,
 	
     vs.
 	
STEC, INC., MANOUCH MOSHAYEDI, and MARK MOSHAYEDI,
 	
                              Defendants.
 	
[Caption continued on next page]
	Case No. SACV09-01304 JVS (MLGx)
	
	CLASS ACTION
	
	DECLARATION OF JEFF S. WESTERMAN IN SUPPORT OF THE MOTION OF THE HESTER FAMILY FOR CONSOLIDATION, APPOINTMENT OF LEAD PLAINTIFF AND APPROVAL OF LEAD COUNSEL SELECTION
	
	DATE: February 8, 2010
	TIME: 1:30 p.m.
	CTRM: 10C
	JUDGE: HON. JAMES V. SELNA

HADI SAKHAI, Individually and on Behalf of All Others Similarly Situated,	) Case No. SACV09-01306 JVS) (MLGx)
Plaintiff,	)
vs.	)
STEC, INC., MANOUCH MOSHAYEDI, MARK MOSHAYEDI, RAYMOND D. COOK, J.P. MORGAN SECURITIES INC., DEUTSCHE BANK SECURITIES INC., BARCLAYS CAPITAL INC. and OPPENHEIMER & CO. INC.,	)))))
Defendants.	)
FRED GREENWALD, Individually and on Behalf of All Others Similarly Situated,	) Case No. SACV09-1315 JVS) (MLGx)
Plaintiff,	)
vs.	)
STEC, INC., MANOUCH MOSHAYEDI and MARK (MERHDAD) MOSHAYEDI,	))
Defendants.	)
DANIEL MUNTER, Individually and on Behalf of All Others Similarly Situated,	) Case No. SACV09-1320 JVS) (MLGx)
Plaintiff,	)
vs.	)
STEC, INC., MANOUCH MOSHAYEDI, MARK MOSHAYEDI and RAYMOND D. COOK,	)))
Defendants.	)

DECLARATION OF JEFF S. WESTERMAN IN SUPPORT OF THE MOTION OF THE HESTER FAMILY FOR CONSOLIDATION, APPOINTMENT OF LEAD PLAINTIFF AND APPROVAL OF LEAD COUNSEL SELECTION

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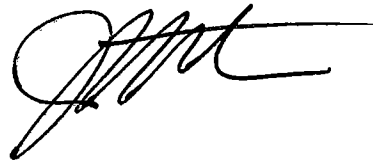|		

JONATHAN FISCHER, Individually and on Behalf of All Others Similarly Situated,
 	
                    Plaintiff,
 	
     vs.
 	
STEC, INC., MANOUCH MOSHAYEDI, MARK MOSHAYEDI and RAYMOND D. COOK,
 	
                    Defendants.
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		Case No. SACV09-8536 JVS (MLGx)

MARCEL WEINBERGER, Individually and on Behalf of All Others Similarly Situated,
 	
                    Plaintiff,
 	
     vs.
 	
STEC, INC., MANOUCH MOSHAYEDI, MARK MOSHAYEDI and RAYMOND D. COOK,
 	
                    Defendants.
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		Case No. SACV09-1460 JVS (MLGx)

DECLARATION OF JEFF S. WESTERMAN IN SUPPORT OF THE MOTION OF THE HESTER FAMILY FOR CONSOLIDATION, APPOINTMENT OF LEAD PLAINTIFF AND APPROVAL OF LEAD COUNSEL SELECTION

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I, Jeff S. Westerman, under penalties of perjury, hereby declare:

1. I am an attorney duly licensed to practice before all of the courts of the State of California. I am a member of the law firm of Milberg LLP ("Milberg"), one of the counsel of record for the Hester Family, in the above-entitled action. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. I submit this declaration in support of the motion of the Hester Family for Consolidation, Appointment as Lead Plaintiff and Approval of Selection of Lead Counsel.

3. Attached hereto as Exhibit A is a true and accurate copy of the PSLRA certifications of Movants Cebron W. Hester, Judy W. Hester, and Justin Black (the "Hester Family" or "Movant").

4. Attached hereto as Exhibit B is a chart analyzing the Hester Family's financial interest in the litigation.

5. Attached hereto as Exhibit C is a true and correct copy of the PSLRA notice published in *Business Wire* on November 06, 2009 by counsel for plaintiff in the first-filed action.

6. Attached hereto as Exhibit D is the firm résumé of Milberg LLP. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 5th day of January, 2010, at Los Angeles, California.

/s/ Jeff S. Westerman
JEFF S. WESTERMAN